	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
5 64.604 B.5	Technology		
	No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of	VCO service of TRS (4	leader in th
	vith disabilities. VCO & HCO technology, are required to be standard features of TRS.		

		FCC CapTe1	
	FCC Requirement	Declaratory Ruling	Sprint's Commitment
			Sprint's Commitment
	THE RESIDENCE AND SOME	(FCC 03-190)	
δ 64.604 B.6	Volcemail		
	Interactive Menus		
		Requirement applies.	CapTel user both hears
	CAs must alert the TRS		and interacts directly
	user to the presence	的是有工作。	with the recorded
	of a recorded message		message and makes the
	interactive menu		selections as
	thru a hot key on the		requested by the
	ch's terminal,		interactive menu.
			The CapTel user is
			alerted to the
			presence of a
			recording by hearing
	The second secon		the recording and
			seeing the captions of
		Requirement applies.	the recording as the
	The state of the s	医氯苯异氏化精酸	message is played.
	TRS providers shall		
	electronically capture		
	recorded messages 4		CapTel users can
	的时间是一个大大的人们的		replay messages as
	length of the call, 4		required until the
	may not impose any charges for additional		message is both heard
			and read as captions.
	calls that must be		The user can stay on
	made by the user in		the line as long as
	order to complete		desired until the
	calls involving		message is heard in
	recorded or		its entirety or
	interactive messages.		replayed. This is
			requested by the user
			directly. The CapTel
			user interacts with
			the recorded message
	TRS will handle pay-		system directly. This
	per-calls.		is treated as one

call.

FCC	Cap	Tel
-----	-----	-----

FCC Requirement

Declaratory Ruling
(FCC 03-190)

Sprint's Commitment

Functional Standards

	604	

Consumer Complaine

States must maintain a

log of complaints

including

complaints about TRS

to include minimum

include the date the

complaint was filed,

the nature of the

complaint, the date of

resolution and an explanation of the resolution,

Requirement applies.

Sprint CapTel
maintains a log of all
complaints. The log
includes all of the
required fields
including the date,
the nature, the date
of resolution, and the
explanation of
resolution.

States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.

sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
δ 64.604 c.2	Contact Persons		
	States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.	Requirement applies.	Sprint CapTel provide full support including a primar point-of-contact, to contract administrators to meet FCC requirements.

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
6 64,604 C.3	Public Access to into		
	Carriers, through	Requirement applies.	Sprint follows all FCC
	publication in their		requirements for
	directories, periodic		public access to
	billing inserts.	100年 - 新用学中,100 年前 100年 - 100年 - 100	information and
	placement of TRS		publishes in
	instructions, in phone		directories, brochures
	directories, DA		and billing inserts,
	services,		instructions for TRS
	incorporation of TTV		including 711 access
	numbers in phone		in phone directories,
	directories, shall		DA services and the
	assure that callers	· 人名英格兰 医脑	incorporation of TTY
	are aware of all forms		numbers in phone
	of TRS.		directories to assure
			that callers are aware
			of all forms of TRS.
	Conduct		
	education and outreach		
	programs to publicize		
	availability of 711		
	access.		

functionally equivalent voice equivalent voi communication services communication with respect to such factors as the duration of the call; the time of day, and the distance from the point of origination to the point of		FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitmen
the rates paid for rates paid functionally functionally equivalent voice equivalent voice communication services communication services. factors as the duration of the call, the time of day, and the distance from the point of origination to the point of origination	64.604 c.4	Rates		
the rates paid for rates paid functionally functionally equivalent voice equivalent voice communication services communication services. factors as the duration of the call, the time of day, and the distance from the point of origination to the point of			Page 1	
the rates paid for functionally functionally equivalent voice equivalent voice communication services communication services. With respect to such services. factors as the duration of the call, the time of day, and the distance from the point of origination to the point of		the form of the first and the first of the f	Requirement appries.	
functionally equivalent voice equivalent voi communication services communication with respect to such factors as the duration of the call; the time of day, and the distance from the point of origination to the point of				
equivalent voice equivalent voi communication services communication with respect to such factors as the duration of the call; the time of day, and the distance from the point of origination to the point of		the rates paid for		rates paid f
communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of		functionally		functionally
with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of		equivalent voice		equivalent voi
factors as the duration of the call, the time of day, and the distance from the point of origination to the point of		communication services		communication
duration of the call, the time of day, and the distance from the point of origination to the point of		with respect to such		services.
the time of day, and the distance from the point of origination to the point of		factors as the		
the distance from the point of origination to the point of		duration of the call;		
the distance from the point of origination to the point of		the time of day, and		
point of origination to the point of		the distance from the		
to the point of				
		Select OFFICE and Control of State of the College.		
		termination.		

	FCC Requirement	FCC CapTe1 Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
8 64.604 c.5	Ourisdictional Separation of Costs (1) General where	Requirement applies.	(i) Sprint follows FCC
	appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for		requirements in the jurisdictional separation of costs.
	in the Commission's regulations (ii) Cost recovery, Costs caused by interstate TRB shall be recovered from all subscribers for every,		(ii) Interstate CapTel is recovered from all subscribers of interstate services
	interstate service, utilizing a shared-funding cost recovery mechanism (iii) Telecommunications Relay Services Fund— To be administered by the National Exchange Carrier Association, Inc. (NECA)		(iii) Sprint works with NECA for reimbursement of interstate minutes.

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Õ 64.604 C.6	Complaints .		
	(1) Referral of complaint,	Requirement applies.	The Sprint CapTe Customer Contac process is full
	(ii) Intrastate complaint resolution.		compliant with all FC
	(iii) Jurisdiction of Commission,		
	(iv) Interstate complaint resolution,		
	(v) Complaint Procedures		

		FCC CapTel	
	FCC Requirement	Declaratory Ruling	Sprint's Commitment
		(FCC 03-190)	
δ 64.604 C.7	Treatment of TRS		
	Customer Info	是基礎的企業是對	
	Future contacts	Requirement applies.	Sprint transfers
	between the TRS		CapTel customer data
	administrator and the		to incoming CapTel
	TRS vendor shall		vendors. Customer
	provide for the	国际共和国的	information that is
	transfer of TRS		normally contained in
	customer profile date		a TRS profile is not
	from the outgoing TRS		required for CapTel as
	vendor to the incoming		the CA is anonymous to
	TRS vendor. Such date		the call and the
	must be disclosed in		CapTel user talks
	usable form at least		directly to the called
	60 days prior to the		party. The data is
	provider's last day of		provided in usable
	service, and shall not		form at least 60 days
	be sold, distributed,		prior to the last day
	shared or revealed in		of service and is not
	any other way by the		sold, distributed,
	relay provider or its		shared or revealed in
	employees, unless		any other way by
	compelled to do so by		Sprint, or Sprint
	lawful order.		employees unless
	A STATE OF THE STA		Sprint is compelled by
			legal process to
			provide such
			information.

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
6 64.605	Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.	Requirement applies:	Sprint provides each Sprint TRS state a recertification packer and assists in the recertification process.
	and the same of th		
Availability	Concluded that it a	Requirement applies:	Sprint CapTel wil
Availability of SS7	Carried States	Requirement applies:	Sprint CapTel wil
	TRS provider is able	Requirement applies:	
of SS7	TRS provider is able	Requirement applies.	have the capability t
of SS7 Technology to	TRS provider is able to transmit any	Requirement applies:	have the capability t
of SS7 Technology to	TRS provider is able to transmit any calling party	Requirement applies:	have the capability t transmit the 10-digi number and wil
of SS7 Technology to	TRS provider is able to transmit any calling party identifying information to the network, it must	Requirement applies:	have the capability t transmit the 10-digi number and will recognize the I
of SS7 Technology to	TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID	Requirement applies:	have the capability to transmit the 10-diginumber and will recognize the I blocking indicators.
of SS7 Technology to	TRS provider is able to transmit any calling party identifying information to the network, it must	Requirement applies:	have the capability to transmit the 10-diginumber and will recognize the I blocking indicators. Sprint CapTel will
of SS7 Technology to	TRS provider is able to transmit any calling party identifying information to the network, it must provide Caller ID	Requirement applies:	have the capability t transmit the 10-digi number and wil recognize the I

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Types of Calls	Two Line VCO Two Line HCO HCO-to-TIY HCO-to-HCO VCO-to-TTY VCO-to-VCO	Minimum standards pertaining to MCO are waived. VCO requirements still apply.	
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point.	Requirement applies.	CapTel user dials 9-1- 1. Sprint will route the call directly to the most appropriate PSAP.

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Answering	Concluded that the	The requirement was	Answering machine and
Machine	answering machine and	not addressed in the	voicemail retrieval is
Retrieval	voice mail retrieval	Declaratory Ruling.	provided by CapTel.
	are TRS features that		
	must be provided to	2. 加入基本的 2. 产业	
	TRS users.		Answering machine
			retrieval through
	Answering machine	计图图 机基件基件 医生物	CapTel is accomplished
	retrieval through TRS		when the CapTel
	is accomplished when		facility caption the
	the recipient of the		voice message to the
	message, the TRS user,		CapTel users.
	calls the TRS facility		The state of the s
	and has the CA listen.		
	to the voice messages.		
	的位于是一种的人的人类的	perangangan sing	

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Call Release	Concluded that call	Grant Control of the	
	under FCC's Functional		
	equivalency mandate.		
		Residence in the property of the con- party of the property of the con-	
	Call release allows a		
	CA to set up a TTY-to-		
	TTY call that once set		
	up does not require		
	the CA to relay the	FIDERICAL PLAN	
	conversation.		
	feature allows CA to		
	sign-off or be		
	"released" from the		
	telephone line		
	without, triggering a		
	disconnection between		
	two TTY users, after	Maria de la compania	
	the CA connects the		
	originating TTY caller		
	to the called party's		
	TTY through e.g. a		
	business switchboard.		

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Speed Dialing	Concluded that speed	The requirement was	CapTel telephones have
	dialing feature 1	not addressed in the	the Speed Dial
	required under FCC's	Declaratory ruling.	feature.
	equivalency mandate.		
	Speed dialing allows		
	users to manually	一种人	
	store a list of		
	telephone numbers with		
	designated speed		
	dialing codes in the		
	TRS user's consumer		
	profile.		

	FCC Requirement	FCC CapTe1 Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Three-way	Concluded that three-	The requirement was	Sprint CapTel users
Calling	way calling ' is	not addressed in the	will be able to
	required under FCC's	Declaratory Ruling.	participate a three
	functional equivalency		way call. Although
	mandate but did not		the person using the
	specifically mandate		captioned phone is
	the way such	三十四個國際企業的	unable to establish
	functionality had to		the three-way call,
	provide.		the called party will
	的中的基本的是中国的ARAS		be able to do so by
	The FCC's Order		utilizing telephone
	imposing such		switch hook (or
	requirement stated		"flash") button on his
	that "generally"		or her CPE. Thus,
	three-way calling can		Sprint CapTel meets
	be provided "in one of		the requirement for
	two ways " One way is		three-way calling.
	for the TRS consumer		(For One-Line CapTel.)
	to request that the CA		For Two-Line CapTel
	set up the call with		either party can
	two other parties,		initiate a 3 way call
			should the user
	resignation (through the		purchased this as a
	The second way is to		LEC option.
	set up a three-way		
	call is for TRS user		Constitution Committee
	to connect to two		Sprint CapTel users
	telephone lines at the		will be able to
	same time from his or		participate in a
	her premises by using		conference bridge to
	the telephone's switch		speak to three or more
	hook (or "flash")		individuals.
	button,		



Appendix L

Sprint's Report to the FCC on VRS and IP Waivers

Sprint's Report to the FCC on VRS and IP Waivers

FCC Internet and Video Relay Service Annual Progress Report April 16, 2007

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
1. STS	Waived	STS is not	In research	Waived	NA	NA
	through	possible over the	and	Indefinitely;		
	1/1/08	internet. Voice	development	No report		
		over IP (VoIP)	stage. Sprint	required		
		REQUIRES	is			
		Quality of	investigating			
		Service. QoS	and			
		means that all	evaluating			
		the associated	several VoIP			
		data packets	to determine			
		arrive in one	acceptable			
		contiguous	QoS levels to			
		stream and in	support STS			
		order. In the	calls. Sprint			
		"internet" world,	is also			
		there are many	investigating			
		segments owned	LAN/WAN			
		by multiple	systems			
		providers using	where QoS			
		dis-similar	can be			
		routers. Some	controlled			
		support QoS,	internally.			
		some do not.				
		There is, at this				

Waivers	IP Regulatory Status	IP Current Technology Issue/Limitations time, no universal,	Progress and Steps Taken to Meet the Requirement	VRS Regulatory Status	VRS Current Technology Issue/Limitations	Progress and Steps Taken to Meet the requirement
		cooperative methodology to address the internet deficiencies.				
2. Spanish Relay	NA	NA	NA	Compensable but non- mandated service.	NA	Sprint provides ASL to Spanish Video Relay Service.
3. Types of Calls	NA	NA	NA	Waived through 1/1/08	Voice over IP(VoIP) requires Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are	We are currently providing two-line VCO and HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
					owned by	and outbound
					multiple	POTS to Voice
					providers using	user. One
					dis-similar	line VCO and
					routers. Some	HCO began in
					support QoS,	2005. This is
					some do not.	limited to
					The internet	certain types
					cannot be	of end user
					controlled by any	appliances
					single user.	that allow
					There is, at this	voice access
			,		time, no	through the
					universal,	broadband
					cooperative	connection at
					methodology to	end user
			į	· I	address the	equipment.
					internet	
					deficiencies.	
					Sprint offers	
					alternatives VCO	
					and HCO solution	
					by using second	
			 		line (analog line)	
					where the Video	
					Interpreter asks	
					for a second	
					number to call	

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
					back using	
					three-way call	
					feature. The	
					procedure is	
					similar to two-	
					line VCO or HCO	
					call.	
4.	Waived	Internet Protocol	Sprint	Waived	Internet Protocol	No additional
Emergen	through	network (IP	implemented	through	network (IP	information to
cy Call	1/1/08	network) does	a "manual"	1/1/07	network) does	submit
Handling		not support the	(directory		not support the	beyond our
		Automated	assistance		Automated	recent
		Number	lookup)		Number	submission to
		Identification	process for		Identification	the FCC.
		information for	911 calls		information for	Current
		Internet or Video	through		Internet or Video	options may
		Relay Services.	Internet		Relay Services.	restrict
		Without	Relay. The		Without	interoperabilit
		automated	technical		automated	y. An
		knowledge of the	challenge		knowledge of the	Emergency
		originated	remains of		originated	database is
		location of the	tying an exact		location of the	still in
		call, Sprint is not	location to an		call, Sprint is not	use today for
		in position to	IP address.		in position to	subscribers
		transfer 911 calls	No additional		transfer 911 calls	who choose to
		to an appropriate	development		to an appropriate	register a
		PSAP.	has been		PSAP.	profile;
			made that			however,

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress ar
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Take
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet ti
			Requirement			requirement
			would allow		Į.	agents mu
			Internet Relay			verify t
			users to place			location of t
			911 calls		E.	caller, as t
			through			caller may r
			Internet			be at t
			Relay.			same physi
						location
						the prof
						indicates.
5. Speed	NA	NA	NA	1/1/07- 80%	Sprint is	Sprint v
of				of all calls	exceeding the	continue
Answer				within 120	80/120 service	meet f
				seconds	level	requiremen
				(monthly).	requirement that	measured
					went into effect	a mont
					January 1,	basis.
					2007.	
6. Equal	Waived	NA	NA	Waived	The IP network	The techni
Access to	Indefinitely;		1	through	does not support	challenge
Interexch	No report			1/1/08	ANI and end-	remains
ange	required		}		user billing	tying an ex
Carrier					mechanisms.	location to
			1		Without	IP address
					automated	VRS use
					knowledge of	However, t
					ANI location, and	very nature

. •••

Waivers	IP	IP Current	D=====================================	Vinc	VDC 6 4	I
waiveis			Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
					without an ANI	the internet
					to charge back	makes billing
					for tolls calls,	for toll calls
					Sprint cannot	obsolete.
					support equal	
					access to	
					interexchange	
					carrier features	
					for Video Relay	
					Service.	
7. Pay-	Waived	IP network does	The technical	Waived	IP network does	The technical
per-call	through	not support ANI	challenge	through	not support ANI	challenge
(900)	1/1/08	and end-user	remains of	1/1/08	and end-user	remains of
Service		billing	tying an exact		billing	tying an exact
		mechanisms.	location and		mechanisms.	location and
		Without	billing of pay-		Without	billing of pay-
		automated	per-call. No		automated	per-call. No
	i	knowledge of	additional		knowledge of	additional
		ANI location, and	development		ANI location, and	development
		no ANI to charge	has been		no ANI to charge	has been
		back for a pay-	made that		back for a pay-	made that
		per-service call,	would allow		per-service call,	would allow
		Sprint is not	Internet Relay		Sprint is not	Video Relay
		processing 900	end users to		processing 900	end users to
		calls.	be billed for		calls.	be billed for
			pay-per-call			pay-per-call
			services.			services.

Waivers	ΙΡ	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
8. Voice	Waived	As explained in	Sprint is	Waived	As explained in	Sprint is
Carry	through	number three	investigating	through	number three	currently
Over	1/1/08	above, voice	and	1/1/08	above, voice	providing
(VCO)		quality over the	evaluating		quality over the	two-line VCO
(one-		internet is not	several VoIP	•	internet is not	controlled at
line)		universally	alternatives to		universally	the agent
		effective at this	determine		effective at this	position using
		time.	acceptable		time.	IP or ISDN
			QoS levels to			inbound from
			support Voice			Video user
			carry-over		İ	and
			calls. Sprint	<u> </u>	1	outbound POT
			is also			S to Video
	1		investigating			User
			LAN/WAN			and outbound
			systems			POTS to Voice
			where QoS			user. One
<u> </u> 			can be			line VCO,
			controlled	ļ		released in
			internally.			2005, is
						limited to
				1		certain types
						of end user
						appliances
						that allow
						voice access
						through the
						broadband
						connection at

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
						end user
						equipment.
9.	Waived	As explained in	Sprint is	Waived	As explained in	Sprint is
Hearing	through	number three	investigating	through	number three	currently
Carry	1/1/08	above, voice	and	1/1/08	above, voice	providing
Over		quality over the	evaluating		quality over the	two-line HCO
(HCO)		internet is not	several VoIP		internet is not	controlled at
(one-		universally	alternatives to		universally	the agent
line)		effective at this	determine		effective at this	position using
		time.	acceptable		time.	IP or ISDN
			QoS levels to		İ	inbound from
			support			Video user
			Hearing carry-			and
			over calls.			outbound POT
			Sprint is also			S to Video
			investigating			User
			LAN/WAN			and outbound
			systems			POTS to Voice
			where QoS			user. One
			can be			line HCO,
			controlled			released in
			internally.			2005, is
						limited to
						certain types
						of end user
						appliances
					ļ	that allow
						voice access

Waivers	IP	IP Current	Progress and	VRS	VRS Current	Progress and
	Regulatory	Technology	Steps Taken	Regulatory	Technology	Steps Taken
	Status	Issue/Limitations	to Meet the	Status	Issue/Limitations	to Meet the
			Requirement			requirement
						through the
						broadband
					:	connection at
						end user
						equipment.
10. VCO	Waived	As explained in	Sprint's	Waived	As explained in	Sprint's Video
- to -	through	number three	Internet Relay	through	number three	Relay Service
TTY	1/1/08	above, voice	Service is not	1/1/08	above, voice	is not
		quality over the	designed to		quality over the	designed to
		internet is not	connect an		internet is not	connect an
		universally	inbound		universally	inbound video
		effective at this	internet caller	:	effective at this	caller with the
		time.	with the		time.	called party
			called party		Ì	with uses
			who uses TTY			voice, TTY
			user or VCO			user, VCO,
			as			HCO or
			communicatio			anything
			n between			other than
			internet and			video
			baudot			because. the
			protocols are			videoconferen
			not			cing via
			compatible.			internet or
						ISDN
						protocols are
						not
						compatible.